

THE HONORABLE JOHN H. CHUN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AVELARDO RIVERA and YASMINE
ROMERO, individually, and on behalf of all
others similarly situated,

Plaintiffs,

v.

AMAZON WEB SERVICES, INC.,
a Delaware corporation,

Defendant.

No. 2:22-CV-00269-JHC

STIPULATED MOTION AND
ORDER TO MODIFY DEADLINES

NOTE ON MOTION CALENDAR:
FEBRUARY 7, 2024

Pursuant to Local Civil Rules 7(d)(1) and 10(g), defendant Amazon Web Services, Inc. (“AWS”) and plaintiffs Avelardo Rivera and Yasmine Romero (collectively, the “Parties”), jointly move the Court to modify the briefing schedule with respect to Plaintiffs’ Second Motion to Compel (the “Motion”) and to extend Plaintiffs’ deadline to move to compel documents withheld as privileged. The Parties state as follows:

1. On January 25, 2024, Plaintiffs filed their Second Motion to Compel production of certain documents from AWS. Plaintiffs originally noted the Motion for February 9, 2024. In connection with the Motion, Plaintiffs also filed a Motion to Seal documents and deposition testimony designated as confidential, which is noted for February 23, 2024. Dkt. 148.

2. Pursuant to LCR 7.1(d), AWS’s response to the Motion was originally due February 5, and plaintiffs’ reply was due February 9.

3. On Friday, February 2, the Parties discussed the possibility of AWS making a limited production to Plaintiffs in exchange for plaintiffs considering withdrawing their Motion. AWS believes that a limited production may provide Plaintiffs the information they seek while also avoiding the need for the Court's intervention and the time and expense required to conduct an ESI review if ordered by the Court. These negotiations are ongoing.

4. In order to continue negotiations, and also comply with the current briefing schedule, the Parties agreed that: (1) plaintiffs would re-note their Motion for February 23, and (2) the Parties would file this stipulated motion, requesting that the Court modify the briefing schedule as described below.

5. Additionally, pursuant to the Court's Order on Plaintiffs' First Motion to Compel (Dkt. 116), AWS completed several document productions and delivered a privilege log to Plaintiffs on November 29, 2023. In response, Plaintiffs challenged over 100 of the 329 documents withheld as privileged. The Parties have also been in discussions regarding other questions Plaintiffs have asked regarding the privilege log, and are working diligently to resolve these issues amicably and without the Court's intervention. However, Plaintiffs' deadline to file a motion to compel documents withheld as privileged is currently February 9. Dkt. 137. Given the Parties' ongoing efforts to resolve these issues without Court intervention, the Parties request a short extension to continue negotiations.

6. As such, the Parties request that the Court modify the following deadlines as follows:

Item	Current Deadline	Amended Deadline
AWS's deadline to respond to plaintiffs' Motion to Compel	February 19, 2024	February 12, 2024
AWS's deadline to respond to plaintiffs' Motion to Seal	February 19, 2024	February 12, 2024

1	Plaintiffs' deadline to reply in support of plaintiffs' Motion to Compel	February 23, 2024	February 23, 2024 (no change)
2			
3	Plaintiffs' deadline to move to compel documents withheld as privileged	February 9, 2024	March 11, 2024
4			

5 7. As such, good cause exists for the requested modified schedule.

6 WHEREFORE, the Parties respectfully request that the Court enter an order modifying
7 the current schedule in accordance with this Stipulated Motion.

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9 Dated: February 7, 2024

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LCR 7(e) Certification

LCR 7(e) Certification I certify that this memorandum contains 485 words, in compliance with the Local Civil Rules.

/s/ Ryan Spear

ORDER

IT IS SO ORDERED.

DATED this 8th day of February, 2024.

A handwritten signature in black ink, reading "John H. Chun". The signature is written in a cursive style with a horizontal line underneath it.

HONORABLE JOHN H. CHUN
UNITED STATES DISTRICT JUDGE